

REMARKS

As a preliminary, applicant and applicant's undersigned attorney, Eric Cohen, would like to thank Examiner Veillard and his supervisor, Examiner Popovici for the courtesy extended to us during the personal interview conducted on October 26, 2005. The subject matter was complex yet subtle, and ideally discussed in a face-to-face manner.

In view of the personal interview, applicant has amended the claims to more clearly point out aspects of the invention that distinguish the claimed invention over the reference to Weiss. No new matter has been added, and all amended language is supported by the specification as originally filed, as discussed below.

Regarding changing the term "key word" to "key phrases," the specification states that "A keyword may preferably be a sequence of words or a sequence of stemmed words." (See clean copy of substitute specification, page 5, lines 10-11). Thus, the two terms are both supported in the specification. The limitation of "dynamically extracting key phrases," which is now recited in the independent claims, as amended, may be performed by "any process known in the art." (See clean copy of substitute specification, page 10, lines 18-19).

Reconsideration and further examination of the subject patent application in light of the present Amendment and Remarks is respectfully requested. Claims 1-42 are currently pending in the application and stand rejected under 35 U.S.C. §103 as being unpatentable over Weiss in view of Beall, as set forth on pages 2-9 of the Office Action. In view of the claims as presently amended, and in view of the Examiner's interview, applicant respectfully traverses this rejection.

With regard to distinguishing over Weiss, and as discussed during the Examiner's interview, Weiss discloses a method to build a hierarchy of clusters of documents. Each cluster maps to a set of documents, and a set of keywords is associated with each cluster.

Weiss thus works with two data structures as follows:

1) Cluster₁ { Document_{1_1},, Document_{1_Nc1} } ...

Cluster_n { Document_{n_1}, Document_{n_Ncn} }

2) Cluster₁ { Keyword_{1_1},, Keyword_{1_Mc1} } ...

Cluster_m { Keyword_{m_1}, , Keywrod_{m_Mcm}}

In accordance with Weiss, a query selects the appropriate matching clusters, and then displays the keywords associated with each cluster. In contrast, in applicant's claimed invention, a set of key phrases is extracted from the documents matching the query, and a subset of these key phrases is then selected and displayed to the user.

Applicant's method thus uses a first structure where each document is associated with a set of key phrases as follows:

Document₁ { Keyphrase_{1_1}, Keyphrase_{1_n1} }

Document_k { Keyphrase_{k_1}, Keyphrase_{k_nk} } from which a union of matching key phrases is built:

{Keyphrase₁ Keyphrase_n } = { Keyphrase_{1_1} ..., Keyphrase_{1_n1} }

U ... U {Keyphrase_{k_1}, Keyphrase_{k_nk} } and then a subset is selected:

{Keyphrase_{s1}, Keyphrase_{sn'} }

Applicant's method has the advantage that the displayed key phrases are always extracted from the results of the query, whereas the Weiss method provides weaker assurance that the

displayed keywords are related to the cluster of documents to whom the resulting documents belong.

For the above reasons and for reasons discussed in the Examiner's interview, applicant asserts that independent claims 1, 15, 28 and 31 are allowable over Weiss, and that claims depending from the independent claims respectively, are allowable as depending from allowable base claims.

The art made of record by the Examiner but not relied upon as a basis of rejection, does not, whether taken alone or in combination with Weiss and Beall, anticipate or render obvious any of applicants' claims as now amended in the application.

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits an early Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or

even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920. A duplicate copy of this sheet(s) is enclosed.

Respectfully submitted,

WELSH & KATZ, LTD.

By



Eric D. Cohen
Registration No. 38,110

November 14, 2005

WELSH & KATZ, LTD.
120 South Riverside Plaza
22nd Floor
Chicago, Illinois 60606
(312) 655-1500